

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS**

ENRIQUE ZAMARRIPA  
a Natural Person and Resident of Texas,

Plaintiff,

v.

LOUIS FARRAKHAN,  
a Natural Person, and Minister and Leader of  
Nation of Islam  
7351 South Stony Island Avenue  
Chicago, Illinois 60649

and

NATION OF ISLAM  
7351 South Stony Island Ave.  
Chicago, IL, 60649

and

REVEREND AL SHARPTON,  
a Natural Person, and founder and President of  
the National Action Network  
106 W. 145th Street  
Harlem, New York 10039

and

NATIONAL ACTION NETWORK,  
106 W. 145<sup>th</sup> Street  
Harlem, NY, 10039

and

BLACK LIVES MATTER,  
Maryland

and

RASHAD TURNER,  
a Natural Person, and co-founder and leader of

**COMPLAINT**

the Black Lives Matter movement and  
#blackLivesMatter network  
Minnesota

and

OPAL TOMETI,  
a Natural Person, and co-founder and leader of  
the Black Lives Matter movement and  
#blackLivesMatter network  
New York

and

PATRISSE CULLORS,  
a Natural Person, and co-founder and leader of  
the Black Lives Matter movement and  
#blackLivesMatter network  
California

and

ALICIA GARZA,  
a Natural Person, and co-founder and leader of  
the Black Lives Matter movement and  
#blackLivesMatter network  
California

and

DERAY MCKESSON,  
a Natural Person, and co-founder and leader of  
the Black Lives Matter movement and  
#blackLivesMatter network  
Maryland

and

JOHNETTA ELZIE,  
a Natural Person, and co-founder and leader of  
the Black Lives Matter movement and  
#blackLivesMatter network  
Missouri

and

NEW BLACK PANTHERS PARTY  
Maryland

and

MALIK ZULU SHABAZZ,  
a Natural Person, and leader of  
the New Black Panthers Party  
Washington, D.C.

and

GEORGE SOROS,  
a Natural Person and financier of the  
Black Lives Matter movement  
New York

Defendants.

### **COMPLAINT**

In this Complaint, Plaintiff Enrique Zamarripa (“Plaintiff”) sues Defendants Louis Farrakhan, Nation of Islam, Al Sharpton, National Action Network, Black Lives Matter, Rashad Turner, Opal Tometi, Patrisse Cullors, Alicia Garza, Johnetta Elzie, Deray McKesson, New Black Panthers Party, Malik Zulu Shabazz, and George Soros (collectively “Defendants” unless individually named) in their individual and official capacities where applicable, and in support allege as follows:

#### **I. INTRODUCTION AND NATURE OF THE ACTION**

1. This is a civil action for the wrongful death of Patrick Zamarripa, the Dallas police officer who was murdered by Micah Johnson during the July 7 shootings in Dallas, Texas, who was acting as an agent of and at and under the direction of Defendants Louis Farrakhan, Nation of Islam, New Black Panthers Party, Black Lives Matter and their respective leaders, Al Sharpton, National Action Network and financed by Defendant George Soros. Plaintiff is the

father of Patrick Zamarripa. Plaintiff also bring a claim of Intentional Infliction of Emotion Distress against each and every Defendant.

## **II. JURISDICTION AND VENUE**

2. This Court also has subject matter jurisdiction over this action based on diversity of citizenship pursuant to 28 U.S.C. § 1332(a)(2), because there is complete diversity of citizenship between the Plaintiff and the Defendants.

3. On information and belief, the citizenship of the Defendants are:

- a. Louis Farrakhan, Illinois
- b. Nation of Islam, Illinois
- c. Al Sharpton, Harlem, New York
- d. National Action Network, New York
- e. Black Lives Matter, Maryland
- f. Mr. Rashad Turner, Minnesota
- g. Ms. Opal Tometi, New York
- h. Ms. Patrisse Cullors, California
- i. Ms. Alicia Garza, California
- j. Ms. Johnetta Elzie, Missouri
- k. Mr. DeRay McKesson, Maryland
- l. Mr. Malik Zulu Shabazz, Washington, D.C.
- m. New Black Panther Party, Maryland
- n. Mr. George Soros, New York

4. The matter in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

5. This Court also has supplemental jurisdiction over this action pursuant to 28 U.S.C. § 1367.

6. Venue is proper in this district pursuant to 18 U.S.C. § 2334(a) and 28 U.S.C. §§ 1391(b) and 1391(d) because harm from the conspiracy and incitement occurred in this District in Dallas, Texas, when twelve police officers were shot, five dead at this writing, within this District on July 7, 2016.

### **III. STANDING AND THE INDIVIDUAL PLAINTIFF PARTIES**

7. Enrique Zamarripa (“Zamarripa”) is the father of Patrick Zamarripa, who was murdered by Defendants Farrakhan, Nation of Islam (“NOI”) and New Black Panther Party (“NBPP”) follower Micah Johnson (“Johnson”) on July 7, 2016. Patrick Zamarripa was one of five officers who were murdered by Johnson during the Dallas tragedy, which was carried out by Johnson in furtherance of, and under direction from, Defendants Louis Farrakhan (“Farrakhan”), NOI, Malik Zulu Shabazz (“Shabazz”), NBPP, Al Sharpton (“Sharpton”), National Action Network (“NAN”) and the Black Lives Matter movement and its leaders (“BLM Defendants”), and financed by Defendant George Soros.

### **IV. FACTS COMMON TO ALL COUNTS**

8. By the acts alleged herein, Defendants, each and every one of them, have incited committed unlawful acts including violent riots, assaults and murders of police, and acts of violence, including seriously bodily injury or death, against police officers and other law enforcement persons of all races and ethnicities, Jews, and Caucasians. In a classic form of illegal incitement to imminent violence of an angry mob, Defendants, acting in concert, and each and every one of them are inciting the imminent serious bodily injury and killing of police officers and other law enforcement persons of all races and ethnicities, Jews, and Caucasians by

convincing their supporters and others that there is a civil war between blacks and law enforcement, thereby calling for immediate violence and severe bodily injury or death. Defendants incite people to violence and cause violence by telling those people that they are under attack. Defendants are encouraging disaffected blacks to ignore, disrespect, and assault law enforcement officials, and commit violence and lethal force.

9. The Defendants acting in concert and each of them have publicly called for and incited people to violence with the fiction that police officers (including many black and minority police officers) are intentionally and systematically targeting and hunting blacks and other minorities to kill them for no reason other than racism or sport.

10. The Defendants acting in concert and each of them have publicly incited people with the fiction that police officers (including many black and minority police officers) are intentionally and knowingly arresting and prosecuting blacks and other minorities who have not committed a crime.

11. The Defendants acting in concert and each of them have publicly incited people to violence against the Plaintiff and other members of the class herein with the fiction that blacks and other minorities are being arrested and prosecuted disproportionately to the crimes that individual arrestees actually committed.

12. As a direct and proximate result of Defendants' race war against police officers and law enforcement persons of all races and ethnicity, Jews, and Caucasians, intimidating and threatening law enforcement from doing their duties, more than 30 major U.S. cities have reported increases in violence from a year ago.<sup>1</sup>

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<sup>1</sup> Monica Davey & Mitch Smithaugh, "Murder Rates Rising Sharply in Many U.S. Cities," The New York Times, August 31, 2015, available at <http://www.nytimes.com/2015/09/01/us/murder-rates-rising-sharply-in-many-us-cities.html/>

13. “The equilibrium has changed between police and offenders,” said Alfred Blumstein, a professor and a criminologist at Heinz College, Carnegie Mellon University.<sup>2</sup>

14. As even The New York Times must reluctantly concede, “Among some experts and rank-and-file officers, the notion that less aggressive policing has emboldened criminals — **known as the “Ferguson effect”** in some circles — is a popular theory for the uptick in violence.”<sup>3</sup>

15. Murders in the City of Baltimore have soared by 56% over the last year as a direct and proximate consequence of the Defendants’ political war on police, intimidating and threatening police with prosecution for doing their jobs, encouraging criminals that the police are being restrained and held back from enforcing the law, and inciting criminals with rationalizations, pretexts, and excuses for their looting, crimes, and murder in the name of the grievances spread by the Defendants.

16. Milwaukee, Wisconsin, experienced a 76 percent increase in murder over the same period last year, with 104 people killed so far this year.

17. In St. Louis, Missouri, 136 people had been killed this year, a 60 percent rise from the 85 murders the city had during the same time last year.

18. In New Orleans, 120 people have been killed by late August, 2015, compared with 98 during the same period a year ago.

19. In Washington, D.C., murders totaled 105, compared with 73 people a year ago.

20. In New York, New York, killings have increased by about 9 percent, to 208 through mid-August from 190 a year earlier. Homicides in Chicago are up about 20 percent over the same period a year ago.

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<sup>2</sup> *Id.*

<sup>3</sup> *Id. (Emphasis added.)*

21. When no police officers were indicted in the death of Eric Garner in New York City, the Mayor of New York City, William de Blasio, stigmatized and defamed his own New York City's police department as racists and bullies who need to be reigned in and retrained, thus justifying and excuses the violent attacks upon police officers.

22. By the Defendants always condemning injury or death of black people, but almost never white people, Defendants send the clear signal that it is acceptable to kill white people, especially white police officers.

23. The War on the Police is directly endangering the public safety of all Americans, but particularly placing in danger law enforcement, members of the legal system, judges, prosecutors, and lawyers:

The number of uniformed officers in the mid-Atlantic city [Baltimore, Maryland] fell 6.1 percent last year and has shrunk by even more in the first half of this year, according to police data seen by Reuters and not previously reported.

The fall in 2015 was the biggest decline in police numbers among nine comparably-sized U.S. cities reviewed by Reuters. The police force in Detroit and El Paso shrank by 4.9 percent and 4.3 percent, respectively, while Denver and Las Vegas saw increases of over 5 percent.

The reasons for the fall are unclear, but it comes at a difficult time when the number of murders and other violent crimes have risen sharply in Baltimore and many other U.S. cities.<sup>4</sup>

24. On July 7, 2016, President Obama accused the U.S. legal system -- presumably including this Court -- of a conspiracy to kill Black men. In his statement he said:

"What's clear is that these fatal shootings *are not isolated incidents*. They are symptomatic of the broader challenges within our criminal justice system, the racial disparities that appear across the system year after year, and the resulting lack of trust that exists

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<sup>4</sup> Scott Malone, "Baltimore Saw Steep Fall in Police Numbers as Murder Rate Soared," Reuters, July 7, 2016, accessible at: <http://www.reuters.com/article/us-baltimore-police-hiring-insight-idUSKCN0ZN0BF>



between law enforcement and too many of the communities they serve." <sup>5</sup>

25. Clearly, the accusation that shootings "are not an isolated incident" is an incitement claiming that there is a knowing, intentional related and connected conspiracy -- "not isolated incidents" -- to intentionally murder Black people.

26. On August 28, 2015, in Cypress, Texas, in Harris County, black gunman Shannon J. Miles ("Miles") approached Deputy Darren Goforth (a 10-year veteran of the Harris County Sheriff's Office) from behind and killed him execution-style as he was pumping gas at a Chevron gas station. <sup>6</sup> Officials found 15 shell-casings at the scene, <sup>7</sup> indicating that Miles had fired 15 shots at Deputy Goforth. As reported, Deputy Goforth never drew nor fired his weapon.

27. Investigators found no provocation that might have set off the attack nor any connection or relationship between Deputy Goforth and his assassin Miles, leading together with the setting at a gas station and circumstances to the conclusion that Miles assassinated Goforth purely because Goforth was a law enforcement officer.

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<sup>5</sup> Leonard Greene, "President Obama gives voice to police brutality victims after Alton Sterling, Philando Castile shootings," New York Daily News, accessible at: <http://www.nydailynews.com/news/politics/president-obama-voice-police-brutality-victims-article-1.2703404> (emphasis added).

<sup>6</sup> Manny Fernandez and David Montgomery, "Texas Deputy Killed 'Because He Wore a Uniform,' Sheriff Says," The New York Times, August 29, 2015, accessible at: [http://www.nytimes.com/2015/08/30/us/shooting-of-texas-deputy-is-called-coldblooded-execution.html?\\_r=0](http://www.nytimes.com/2015/08/30/us/shooting-of-texas-deputy-is-called-coldblooded-execution.html?_r=0)

<sup>7</sup> Emily Shapiro, "Suspect Allegedly Unloaded His Entire Pistol in Texas Deputy," ABC News / Good Morning America, August 31, 2015, accessible at: <http://abcnews.go.com/US/suspect-allegedly-unloaded-entire-pistol-texas-deputy/story?id=33430131>

28. At a news conference, Harris County Sheriff Ron Hickman said that Deputy Goforth “was a target because he wore a uniform,” as Deputy Goforth had no previous contact with the suspect.<sup>8</sup>

29. Harris County Sheriff Ron Hickman and Harris County District Attorney Devon Anderson pushed back against the criticism of police, as Hickman stated “We've heard Black Lives Matter, All Lives Matter. Well, cops' lives matter, too.”<sup>9</sup>

30. Officials investigating the execution have tied the attack by Miles to the wave of protests across the country over police shootings, including the demonstrations after the deaths of Michael Brown and Eric Garner.<sup>10</sup>

31. Similarly, on September 1, 2015, only a few days after the murder of Goforth, Police Officer Joseph Gliniewicz was shot and killed in Fox Lake, Illinois,<sup>11</sup> prompting a manhunt for his two killers still underway at this writing.

32. The inevitable, entirely foreseeable, and predictable result directly and proximately caused by the War on Police incited by each and ever Defendants came to a head on July 7, 2016 in Dallas, Texas. At around 9:00 p.m., on July 7, 2016, at a “Black Live Matters” protest, at least one sniper shot twelve (12) police officers who were on duty to keep the peace at the rally. (“Dallas Police Shooting”).

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<sup>8</sup> “Texas Deputy Killed ‘Because He Wore a Uniform,’ Sheriff Says,” The New York Times, August 29, 2015, *supra*.

<sup>9</sup> “Sheriff links “Black Lives Matter” movement to slain deputy,” CBS News, August 31, 2015, 9:52 accessible at: <http://www.cbsnews.com/news/darren-goforth-killing-sheriff-cites-black-lives-matter-movement/>

<sup>10</sup> , “Texas Deputy Killed ‘Because He Wore a Uniform,’ Sheriff Says,” The New York Times, August 29, 2015, *supra*.

<sup>11</sup> ”“Blue and Brave”: Illinois town rallies around police as search for officer's killer goes on,” Fox News, September 02, 2015, accessible at: <http://www.foxnews.com/us/2015/09/01/manhunt-on-for-gunman-after-cop-reportedly-killed-in-chicago/>

33. Of the twelve (12) police officers who were shot during the Dallas Police Shooting, five (5) were killed. Among the officers killed in the Dallas Police Shooting was Patrick Zamarripa, who was the son of Plaintiff Zamarripa.

34. The perpetrator of the Dallas Police Shooting Micah Johnson (“Johnson”) took position in a parking garage high above the protest so that he could pick off the police officers from a high angle and altitude without hitting anyone else in the parade but police officers. As the Washington Post reported:

Videos circulating on social media showed an individual with an assault-style rifle shoot a police officer in the back at point-blank range.

A gunman, believed to be the same shooter, then engaged in a violent, three-hour standoff with SWAT officers, police said. Brown said the attacker was killed when police detonated an explosive device near him after a hostage negotiator spoke with him.

During this standoff, Brown said the suspect, who was not identified, told police that “he was upset about Black Lives Matter” and angered by the recent police shootings in Louisiana and Minnesota that dominated national news this week.

“He said he was upset about the recent police shootings,” Brown said during a Friday morning news conference. “The suspect said he was upset at white people. The suspect stated he wanted to kill white people, especially white officers.”

Dallas Mayor Mike Rawlings told CBS News that in addition to the dozen officers shot, two other people also wounded by gunfire, though their conditions were not immediately known.

“No words to describe the atrocity that happened to our city,” Brown said. “All I know is this must stop, this divisiveness between our police and our citizens.”<sup>12</sup>

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<sup>12</sup> *Id.*

35. According to The Washington Post "The Dallas police chief said [Johnson] told authorities 'he was upset about the recent police shootings' and 'wanted to kill white people, especially white officers.'"<sup>13</sup>

36. Thus, Johnson systematically and intentionally picked off 12 police officers while largely ignoring the rest of the crowd who were not police.

37. The Daily Caller similarly reported the statements by Johnson:

Dallas police chief David Brown announced at a press conference Friday morning that one of the suspects in Thursday night's sniper attacks that left five officers dead and seven others wounded told authorities his motivation for the shooting was that he was "upset about Black Lives Matter" and "wanted to kill white people," especially white police officers.

"The suspect said, he was upset about Black Lives Matter. He said, he was upset about the recent police shootings. The suspect said he was upset at white people. The suspect said he wanted to kill white people, especially white officers. The suspect stated that we will eventually find the IEDs," Brown said. "The suspect stated that he was not affiliated with any groups and he stated that he did this alone."<sup>14</sup>

38. The Guardian further reported:

The shooting marked the deadliest attack on law enforcement officers since 9/11 and threatened to inject yet more tension into the already divisive debate over racial disparities in US policing.<sup>15</sup>

39. Investigation into Johnson's background revealed that Johnson was a member of Defendant NOI and Defendant NBPP. The Dallas Police Shooting was perpetrated by Johnson

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<sup>13</sup> Tim Madigan, Michael E. Miller, Travis M. Andrews and Mark Berman, "Snipers kill five police officers in Dallas, wound seven others during protest," The Washington Post, July 8, 2016, accessible at: [https://www.washingtonpost.com/news/morning-mix/wp/2016/07/08/like-a-little-war-snipers-shoot-11-police-officers-during-dallas-protest-march-killing-five/?hpid=hp\\_rhp-top-table-main\\_mm-dallas-1120pm-6a%3Ahomepage%2Fstory](https://www.washingtonpost.com/news/morning-mix/wp/2016/07/08/like-a-little-war-snipers-shoot-11-police-officers-during-dallas-protest-march-killing-five/?hpid=hp_rhp-top-table-main_mm-dallas-1120pm-6a%3Ahomepage%2Fstory)

<sup>14</sup> Peter Hasson, "Police: Dallas Suspect 'Upset About Black Lives Matter,' 'Wanted To Kill White People,'" Daily Caller, July 8, 2016, accessible at <http://dailycaller.com/2016/07/08/police-dallas-suspect-upset-about-black-lives-matter-wanted-to-kill-white-people/#ixzz4Dpv3nyCs>

<sup>15</sup> *Id.*

under the direction of Defendants NOI and NBPP, in furtherance of Defendants' NOI and NBPP's historical and undeniable mission to incite violence against whites, and Jews in particular.<sup>16</sup>

40. Additionally, Col. Derek Harvey ("Harvey") determined that the BLM Defendants, were directly and proximately responsible for the Dallas Police Shootings, as well as the overall increase in violence against police officers. Harvey was the first Director of the Afghanistan-Pakistan Center of Excellence at U.S. Central Command (CENTCOM) and a retired United States Army Colonel. He was selected by General David Petraeus in 2009 to lead the new organization. Harvey is a Senior Executive Service-member of the Defense Intelligence Agency (DIA), and was the previous senior analytical specialist for Iraq to Petraeus, then Commander, Multi-National Forces-Iraq.

41. Harvey stated on Fox News at 11:20 a.m. on July 8, 2016, that Black Lives Matter directly caused and incited the shooting of 12 police officers in Dallas, Texas, on July 8, 2016.

42. Defendant George Soros ("Soros") has served as the financier of the BLM Defendants and other similar organizations with the goal of inciting a race war and inciting and advocating deadly violence against law enforcement officers, Caucasians, and Jews. Soros has given at least \$33 million in one year to support of these organizations.<sup>17</sup>

43. Defendants, each and every one of them, have engaged in a pattern and practice of either directly inciting acts of violence against law enforcement officers, Caucasians, and Jews, or using their positions of authority and influence to condone such behavior and spread the message of hate and violence in order to incite a racial war in America.

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<sup>16</sup> Pamela Geller, *Dallas Mass Cop Murderer was Follower of Nation of Islam*, July 8, 2016, available at: <http://pamelageller.com/2016/07/dallas-mass-cop-murderer-was-follower-of-nation-of-islam.html/>

<sup>17</sup> Washington Times, *George Soros Funds Ferguson Protests, Hopes to Spur Civil Action*, <http://www.washingtontimes.com/news/2015/jan/14/george-soros-funds-ferguson-protests-hopes-to-spur/>

**A. Defendant Louis Farrakhan**

44. Defendant Louis Farrakhan (“Defendant Farrakhan”) is the current leader of Defendant NOI, a group which has firmly established its deeply racist, anti-Semitic, and anti-gay position, and has announced those positions publically through its actions and words.

45. In furtherance of the hateful and violent dogmatic beliefs and principles of Defendant NOI, and of his own interests, Defendant Farrakhan has engaged in a pattern and practice of advocating for and inciting deadly violence against law enforcement officers, Caucasians, and Jews, as described in detail below.

46. On March 5, 2015, Defendant Farrakhan incited Black members of the U.S. military to desert and engage in mutiny and violent insurrection against their country.

47. Specifically referring to the deaths of Michael Brown, Tamir Rice and Eric Garner, among others, during encounters with the police, Farrakhan incited the crowd that day that --

If the government cannot protect our lives ... why are you in the Armed Forces, fighting for a democracy that you don't have at home? Why are you in the Armed Forces of America going overseas to fight somebody that never did a thing to you and act pitiful when your own people are shot down in front of you?

And:

I'm calling on all the soldiers that fight for America, come home and let's unite and fight for our lives that the federal government refuses to fight for us. Then we must fight for ourselves.<sup>18</sup>

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<sup>18</sup> Video of Farrakhan's speech posted at: Billy Hallowell, "Did Louis Farrakhan Just Call for Armed Resistance? Minister's Fiery Call to all 'Black Soldiers in the U.S. Armed Forces' to 'Come Home, Unite and Fight'," March 5, 2015, accessible at <http://www.theblaze.com/stories/2015/03/05/did-louis-farrakhan-just-call-for-armed-resistance-ministers-fiery-call-to-all-black-soldiers-in-the-u-s-armed-forces-to-come-home-unite-and-fight/#sthash.GoVh5b3s.dpuf>

48. During the speech, Farrakhan held up the deaths of Michael Brown, Tamir Rice and Eric Garner as evidence that there is inequality in the treatment of black citizens, who must therefore wage war against police officers.

49. Then Farrakhan reinforced this call for violence by sharing a link to the video of his speech, which he had posted on Facebook, through his official Twitter account, with the explanation, "Why I'm calling on all black soldiers in the U.S. Armed Forces to come home, unite & fight for our own lives."

50. Farrakhan's incitement to armed conflict of black active-duty members of the military to engage in armed insurrection against U.S. society also includes inciting black military veterans.

51. On November 22, 2014, Farrakhan spoke to a packed auditorium at the Murphy Fine Arts Center at Morgan State University in Baltimore, Maryland. More than 2,000 people including students, community leaders and distinguished guests came to hear the lecture by the 81 one-year old Nation of Islam leader.<sup>19</sup>

52. During the speech, Louis Farrakhan urged retaliation by violent conflict for the death of Michael Brown, a thief who was shot and killed by a Caucasian police officer in Ferguson, Missouri.

53. Defendant Farrakhan explicitly and specifically sought to stop black community leaders from discouraging the violent revolution, riots, and crime waves that he was calling for.

54. Defendant Farrakhan directed his attacks at other black leaders, but attacked them for discouraging riots and violence:

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<sup>19</sup> Askia Muhammad, "'We need Minister Farrakhan' say Black college students," The Final Call, November 25, 2014, accessible at: [http://www.finalcall.com/artman/publish/National\\_News\\_2/article\\_101953.shtml](http://www.finalcall.com/artman/publish/National_News_2/article_101953.shtml)

"But time has moved on. Your day of leading our people is over," he said. Then he turned to his fellow preachers and repeated the admonition. "You preachers — ***your day of being the pacifier for the white man's tyranny on black people is over. You've got to know they're not going to hear you anymore.***"

(*Emphasis added.*)<sup>20</sup> Defendant Farrakhan condemned others for trying to prevent violence.

55. Defendant Farrakhan called for further violence in Ferguson, Missouri, and clarified his condemnation of other leaders who are trying to avoid the violence:

"They know an explosion is going to come," the Nation of Islam leader said to cheers from the more than 2,000 people crowding the university's Murphy Fine Arts Center. "You leaders are the worst."

56. At one point, Defendant Farrakhan held up what resembled a Quran inside the public school, saying that both the central religious text of Islam and the Bible require a "law of retaliation" and the punishment of "a life for a life."<sup>21</sup>

57. In response to Defendant Farrakhan's calls for "a life for a life", Ismaaiyl Abdullah Brinsley ("Brinsley") brutally executed two New York City police officers only 28 days after Farrakhan's November 22, 2014, incitement to violence. Those two uniformed NYPD officers were shot dead as they sat in their marked police car on a Brooklyn street corner by Brinsley's assassination-style mission to avenge Eric Garner and Michael Brown. There was no

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<sup>20</sup> Doug Donovan, "Speaking at Morgan, Farrakhan predicts violence in Ferguson," The Baltimore Sun, November 22, 2014, <http://www.baltimoresun.com/news/maryland/baltimore-city/bs-md-farrakhan-morgan-20141122-story.html>

<sup>21</sup> Eric Owens, "Louis Farrakhan Urged 'Retaliation' For Michael Brown A Month Before Ismaaiyl Abdullah Brinsley Executed NYPD Cops," Daily Caller, January 2, 2015, accessible at: <http://dailycaller.com/2015/01/02/louis-farrakhan-urged-retaliation-for-michael-brown-a-month-before-nypd-cops-executed/>



warning, no provocation, no other interaction — the two police officers were simply assassinated, targeted for wearing a police uniform.<sup>22</sup>

58. Just three hours before shooting of the two officers, vile anti-police threats were posted to Brinsley's Instagram page. The threats referenced the recent police-involved killings of Eric Garner and Michael Brown. Brinsley wrote, "I'm Putting Wings on Pigs Today" and "They Take 1 Of Ours . . . Let's Take 2 of Theirs."<sup>23</sup>

59. In August, 2015, Defendant Farrakhan delivered a speech at Mt. Zion Baptist Church in Miami, Florida again inciting 10,000 black volunteers to mobilize and kill police officers, Jews, and Caucasian Americans in retaliation of the oppression of black people.<sup>24</sup>

60. Defendant Farrakhan called for angry blacks to "stalk them and kill them" (Jews and Caucasians) as the "400-year old enemy."

61. Farrakhan explicitly incited "10,000 fearless men" to commit imminent violence saying "rise up and kill those who kill us; stalk them and kill them and let them feel the pain of death that we are feeling!"<sup>25</sup>

62. Referring to a million as being the "Million Man March" in Washington, D.C., Farrakhan further incited "I'm looking for 10,000 in the midst of a million. Ten thousand fearless men who say death is sweeter than continued life under tyranny."<sup>26</sup>

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<sup>22</sup> Larry Celona, Shawn Cohen, Jamie Schram, Amber Jamieson and Laura Italiano, "Gunman executes 2 NYPD cops in Garner 'revenge,'" The New York Post, December 20, 2014, accessible at: <http://nypost.com/2014/12/20/2-nypd-cops-shot-execution-style-in-brooklyn/>

<sup>23</sup> *Id.*

<sup>24</sup> See also Farrakhan's Facebook Page <https://www.facebook.com/OfficialMinisterFarrakhan/videos/vb.365178373589441/845109225596351/>

<sup>25</sup> Pam Key, "Farrakhan: We Must Rise Up and Kill Those Who Kill Us; Stalk Them and Kill Them," *Breitbart*, August 4, 2015, accessible at <http://www.breitbart.com/video/2015/08/04/farrakhan-we-must-rise-up-and-kill-those-who-kill-us-stalk-them-and-kill-them/>

<sup>26</sup> "Farrakhan speaks on 'Law of Retaliation,'" *The Final Call - Uncompromised News & Perspectives*, August 3, 2015, accessible at: <https://www.youtube.com/watch?v=Zr4bYXK7je8>

63. Farrakhan incited blacks, with an appeal of being heroes in the race war cause, to “stalk them and kill them” referring to any and all Caucasians and especially police officers of all races and ethnicities.

64. Defendant Farrakhan called for the imminent killing of police officers of all races and ethnicities, Jews, and Caucasians when he demanded that “if the federal government will not intercede in our affairs, then we must rise up and kill those who kill us, stalk them and let them feel the pain of death that we are feeling!”<sup>27</sup>

65. Defendant Farrakhan further stated that “Death is sweeter than watching us slaughter each other to the joy of a 400-year-old enemy. Death is sweeter. The Qur’an teaches persecution is worse than slaughter then it says, retaliation is prescribed in matters of the slain. Retaliation is a prescription from God to calm the breasts of those whose children have been slain.”<sup>28</sup>

66. On June 24, 2015, appearing in the course of the same “Justice or Else! Tour” at the Metropolitan African Methodist Episcopal church in Washington DC, Farrakhan gave an impassioned speech denouncing America<sup>29</sup> and aligning all white Americans with the sentiments of the racist murderer in Charleston, South Carolina, Dylan Roof.<sup>30</sup>

67. In his speech, Defendant Farrakhan explicitly called for murder, stating, “Retaliation is a prescription from God to calm the breasts of those whose children have been

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<sup>27</sup> *Id.*

<sup>28</sup> Richard B. Muhammad and Janiah Muhammad, “We are not asking for justice, we are demanding justice,” *The Final Call*, August 4, 2015, accessible at [http://www.finalcall.com/artman/publish/National\\_News\\_2/article\\_102517.shtml](http://www.finalcall.com/artman/publish/National_News_2/article_102517.shtml)

<sup>29</sup> Gregory Tomlin, “‘Stalk them and kill them,’ Farrakhan says, calling for 10,000 volunteers to kill whites,” *Christian Examiner*, August 5, 2015, accessible at <http://www.christianexaminer.com/article/farrakhan.calls.for.10000.volunteers.to.kill.whites/49329.htm>.

<sup>30</sup> Matthew Maule, “Farrakhan Exploits Charleston Tragedy,” June 30, 2015, <http://www.christianpost.com/news/farrakhan-exploits-charleston-tragedy-140998/#wwOk9TDoEa6wPVSr.99>

slain. So if the federal government will not intercede in our affairs, then we must rise up and kill those who kill us. Stalk them and kill them and let them feel the pain of death that we are feeling.”<sup>31</sup>

68. Defendant Farrakhan continued by saying, "Death is sweeter than watching us slaughter each other to the joy of a 400 year old enemy. Death is sweet. The Quran teaches persecution is worse than slaughter.”<sup>32</sup>

69. Speaking of the white people of Charleston that joined in the services, vigils, and marches in sympathy with the black victims, Defendant Farrakhan shouted,

“White folks march with you because they don't want you upsetting the city. They don't give a damn about them nine” [the nine black church-goers murdered in a prayer meeting].

70. Because the Charleston, South Carolina, police fed the murderer, as required, shortly after he was arrested, Defendant Farrakhan accused the Charleston police of supporting the murders and praising the murderer Dylann Roof, slanderously proclaiming an inflammatory lie, which Defendant Farrakhan knew to be false, but knew would incite violence:

“And you know what they [the police] were saying? 'You did a good job killing all them [racial epithet].' You think they were sympathetic? If they were sympathetic with us they would have snatched him, put him in chains, had the gun on him.”

71. In fact, news photographs show that the murderer Dylann Roof was arrested in handcuffs by the Charleston, South Carolina police. Law enforcement cannot hold a criminal in detention and deprive them of food. Yet Defendant Farrakhan sought to further lie to further incite violence by claiming that feeding a suspect in jail awaiting trial means that the police support, approve of, and assisted the murders by Dylann Roof

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<sup>31</sup> Tomlin, *supra* note 24.

<sup>32</sup> *Id.*

72. This speech received thunderous applause and cheers in the historic Metropolitan AME Church in Washington D.C., called the “National Cathedral of African Methodism.”

73. That is, while all of Charleston, South Carolina’s churches and community leaders were standing together in unity, appealing for calm, black and white pastors standing side-by-side, Farrakhan was seeking to destroy any sense of unity, calm, or forgiveness.

74. Less than a month after Farrakhan’s speech, on August 26, 2015, a black male named Bryce Williams (“Williams”) executed two of his Caucasian former co-workers filming a tourism story at an idyllic lake in Moneta, Virginia, who worked for a small-town Roanoke, Virginia news station, live on television and then posted disturbing first-person video of the attack on social media.<sup>33</sup>

75. Williams was neither crazy nor acting out of anger but making a political statement and hate crime. Demonstrating that Williams’ double homicide was part of the political movement to effect a race war, Williams not only videotaped the entire incident in the format of news coverage but also carefully waited until the news crew anchorman panned his television camera, then broadcasting live, away from the lake and back to capture the murder live on television.

76. Before Williams was caught by police, Williams took to Twitter to explain his reasons for killing his former coworkers. Williams wrote that one of his victims made “racist comments” and that a complaint was filed against her through the equal employment opportunity commission, but his station chose to hire her anyway.

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<sup>33</sup> Chris Pleasance and Ashley Collman, “Revenge race murder: Bitter black reporter who gunned down white ex-colleagues live on air and posted the video online blames Charleston shootings and anti-gay harassment in manifesto,” *The Daily Mail*, August 27, 2015, accessible at: <http://www.dailymail.co.uk/news/article-3211529/WDBJ7-reporter-Alison-Parker-Adam-Ward-shot-live-TV-Moneta-gunman.html>

77. Also, after the deadly attack, Williams faxed a 23-page manifesto to media, saying “Why did I do it? I put down a deposit for a gun on 6/19/15. The Church shooting in Charleston happened on 6/17/15 . . .” “What sent me over the top was the church shooting. And my hollow point bullets have the victims’ initials on them.’ ‘As for Dylann Roof? You [redacted]! You want a race war [redacted]? BRING IT THEN YOU WHITE . . . [redacted]!!!”

78. Williams’ manifesto and Twitter prove a direct nexus between Defendant Farrakhan’s explicit calls for murder at his June 24, 2015 speech in Washington, D.C., where he spoke about Dylann Roof.

79. Defendant Farrakhan includes Jews in his incitement against “the 400 year enemy.” Defendant Farrakhan has alleged that the Jewish people were responsible for the slave trade and that they conspire to control the government, the media, Hollywood, and various black individuals and organizations. Farrakhan often promotes such messages at public speeches and sermons, some of which attract thousands of followers.

80. During Part II of his 2015 Saviours’ Day keynote address at the Mosque Maryam in Chicago, Illinois, Farrakhan alleged (again) that Israel and Jews orchestrated the 9/11 attacks on the United States, claiming that “Israelis had foreknowledge of the attacks” and that Jews were warned ahead of time not to come to work that day.

81. Farrakhan then went on to speak more broadly of Israeli control of the American government, stating that Israel and Jews “don’t fear America because they control it from within.”

82. Defendant Farrakhan received a standing ovation after telling his audience that “the Satanic Jews that control everything and mostly everybody, if they are your enemy, then you must be somebody.”<sup>34</sup>

83. One of Defendant Farrakhan’s largest attempts to reach new audiences was a 58-part online lecture series, started in January 2013 that lasted through February 2014. In the series, Farrakhan frequently characterized Jews as “Satanic” and promoted a wide range of anti-Semitic conspiracy theories, alleging Jewish control over government, finance, entertainment, and other sectors. The lecture series, which received an average of about 40,000 views per sermon, is part of a larger effort by the Nation of Islam’s media arm to spread its hate through a range of propaganda, including through its newspaper and various social media sites.<sup>35</sup>

84. Defendant Farrakhan has attacked Judaism as a “gutter religion” and Israel as an “outlaw” nation.<sup>36</sup>

85. According to The New York Times, Defendant Farrakhan has repeated for a national television audience his description of Adolf Hitler as “a very great man.”<sup>37</sup>

86. Defendant Farrakhan’s speeches have resulted in the deaths of police officers and law enforcement officials, Jews and Caucasians such as Plaintiff and other members of the class, and, because of his enormous and very loyal followers, continue to cause imminent fear of harm

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<sup>34</sup> “Farrakhan In His Own Words,” Anti-Defamation League, March 20, 2015, accessible at: <http://www.adl.org/anti-semitism/united-states/c/farrakhan-nation-of-islam-noi-in-his-own-words.html>

<sup>35</sup> *Id.*

<sup>36</sup> “Jews Express Outrage at Farrakhan Calling Judaism ‘gutter Religion’, Israel Described As ‘outlaw’ State,” Jewish Telegraphic Agency, June 27, 1984, accessible at: <http://www.jta.org/1984/06/27/archive/jews-express-outrage-at-farrakhan-calling-judaism-gutter-religion-israel-described-as-outlaw-st>

<sup>37</sup> “Farrakhan Again Describes Hitler as a ‘Very Great Man,’” The New York Times, July 17, 1984, accessible at: <http://www.nytimes.com/1984/07/17/us/farrakhan-again-describes-hitler-as-a-very-great-man.html>

and actual harm through serious bodily injury or death to all police officers and law enforcement persons of all races and ethnicities, Jews and Christians.

**B. Defendant Nation of Islam**

87. Defendant Farrakhan's actions were taken in furtherance of the himself and Defendant Nation of Islam ("Defendant NOI"), of which Defendant Farrakhan serves as president.

88. Defendant NOI was founded in Detroit, Michigan, in on July 4, 1930. It has grown into "one of the wealthiest and best-known organizations in black America," which has been fueled by "the deeply racist, anti-Semitic and anti-gay rhetoric of its leaders, including top minister [Defendant] Louis Farrakhan."<sup>38</sup>

89. Defendant NOI has firmly established its deeply racist, anti-Semitic, and anti-gay position, and has announced those positions publically through its actions and words. "While Jews remain the primary target of Farrakhan's vitriol, he is also well known for bashing gay men and lesbians, Catholics and, of course, the white devils, whom he calls "potential humans ... [who] haven't evolved yet."<sup>39</sup>

90. Defendant NOI, in furtherance of its racist and anti-Semitic views, have even associated with white supremacy groups in favor of racial separatism. "All of this has helped make him attractive to certain white supremacist groups who agree that the races must be separated. In its turn, NOI has come to view white supremacists as people who at least understand NOI's program and could therefore become allies."<sup>40</sup>

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<sup>38</sup> Nation of Islam, Southern Poverty Law Center, <https://www.splcenter.org/fighting-hate/extremist-files/group/nation-islam>

<sup>39</sup> *Id.*

<sup>40</sup> *Id.*

91. Additionally, Defendant NOI, in furtherance of its racist and anti-Semitic views, have been willing to tie themselves to “authoritarian and, in many cases, violently repressive foreign leaders for the sake of furthering black and Islamic administrations worldwide. These include Libyan dictator Muammar Ghadaffi, Zimbabwean leader Robert Mugabe, and the now deceased General Muhammad Zia-ul-Haq of Pakistan and Ugandan despot Idi Amin.”<sup>41</sup>

92. In furtherance of its deeply racist, anti-Semitic views, Defendant NOI has called for and incited violence, under the façade of “self-defense”. The great Dr. Martin Luther King quickly realized this—referring to Defendant NOI as “a hate group arising in our midst that would preach the doctrine of black supremacy.”<sup>42</sup>

93. In fact, Defendant NOI’s deeply racist, anti- Semitic, and anti-gay views and calls to violence in furtherance thereof have undeniably caused many recent explosions of violence in the name of Defendant NOI.

94. As set forth above, Johnson shot at a large group of police officers during the recent Dallas Police Shooting, killing five and injuring nine. Johnson was a member of the Defendant NOI, as confirmed through Johnson’s Facebook account. This is consistent with the Defendant Farrakhan’s calls to violence and death amongst his disciples. An article called *Dallas Shooting: Time to Hold Nation of Islam Accountable* by Ryan Mauro confirms that Johnson’s actions were praised by the Nation of Islam.<sup>43</sup>

95. Just hours before the Dallas Police Shooting, Defendant Farrakhan was publishing racist endorsements of violence, saying, “When you are willing and not afraid anymore to pay the price for freedom—don’t let this white man tell you that violence is wrong...He’s doing it as

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<sup>41</sup> *Id.*

<sup>42</sup> *Id.*

<sup>43</sup> available at: <http://m.clarionproject.org/analysis/dallas-shooting-time-hold-nation-islam-accountable>



we speak, and then he has the nerve to come and tell us that violence and hatred won't get it" and that Caucasians are "worthy to be hated."<sup>44</sup>

96. On July 17, 2016, Gavin Eugene Long ("Long") ambushed and shot six police officers in Baton Rouge, Louisiana. Three of Long's victims were killed. It has been revealed that Long was a member of the Nation of Islam, as per Long's own admission on his YouTube channel.<sup>45</sup> Consistent with Defendant Farrakhan's calls to violence and death among his Nation of Islam disciples, Long's motivation behind his murders became apparent through his YouTube channel and his "manifesto," which revealed that Long was intent on targeting police officers. Long referred to Johnson, the gunman who shot and killed five Dallas officers on July 7, 2016 as "one of us."<sup>46</sup>

97. In 2002, Allen Muhammad and Lee Malvo carried out a shooting spree which killed 17 total persons and left an additional 10 persons injured in the Northern Virginia area. Both snipers were members of the Nation of Islam, with Lee Malvo saying, "one of the reasons for the shootings was that white people had tried to harm Louis Farrakhan, leader of the Nation of Islam."<sup>47</sup>

98. In fact, Defendant NOI was inextricably linked to one of the most heinous, racially driven killing sprees in American history. Between the years of 1973 and 1976, four members of Defendant NOI—J.C.X. Simon, Jessie Lee Cooks, Manuel Moore, and Larry Craig

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<sup>44</sup> *Id.*

<sup>45</sup> Chuck Ross, *Baton Rouge Shooter Gavin Eugene Long Was Nation of Islam Member, Railed Against 'Crackers' On YouTube Channel*, Daily Caller, July 17, 2016, available at: <http://dailycaller.com/2016/07/17/baton-rouge-shooter-gavin-eugene-long-was-nation-of-islam-member-railed-against-crackers-on-youtube-channel-video/>

<sup>46</sup> Brian McBride, *Investigators Scour Baton Rouge Gunman's Social Media as Motive Remains Unknown*, ABC News, July 18, 2016, available at <http://abcnews.go.com/US/investigators-scour-baton-rouge-gunmans-social-media-motive/story?id=40657759>

<sup>47</sup> Daniel Pipes, *The Beltway Snipers' Motives*, August 19, 2003, available at <http://www.danielpipes.org/blog/2003/08/the-beltway-snipers-motives>

Green—carried out a plan to “run all the whites out of San Francisco.”<sup>48</sup> In furtherance of this racist agenda, the four members of Defendant NOI “killed 14 people and left at least seven wounded.”<sup>49</sup> Perhaps the most heinous example of their actions was their brutal attack on Quita and Richard Hague. “They sexually assaulted Mrs. Hague then struck her repeatedly with a machete, ‘which nearly decapitated her.’ The attackers hacked at Mr. Hague and left him for dead, but he survived.”<sup>50</sup>

**C. Defendants National Action Network and Al Sharpton**

99. Defendant Al Sharpton (“Defendant Sharpton”) is a supposed political activist against racial prejudice and injustice.<sup>51</sup> Defendant Sharpton founded Defendant National Action Network (“Defendant NAN”) in 1991.<sup>52</sup>

100. Defendant Sharpton has persistently for many years made statements and committed acts to incite and inflame the public, especially minority communities, to commit attacks of violence, death, or serious bodily injury against the police and other law enforcement persons of all races and ethnicities Jews, and Caucasians.

101. On April 10, 2015, Defendant Sharpton pushed the idea of using “civil rights” laws to outlaw local police departments and create a “nationalized” police force. Defendant Sharpton announced in 2015 that Defendant NAN would be taking up the cause of having the U.S. Department of Justice taking over policing all across the country. Defendant Sharpton stated

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<sup>48</sup> Lloys Billingsley, *Remembering a Racist, Black Muslim Murder Spree*, Front Page Mag, March 18, 2015, available at <http://www.frontpagemag.com/fpm/253336/remembering-racist-black-muslim-murder-spree-lloyd-billingsley>

<sup>49</sup> *Id.*

<sup>50</sup> *Id.*

<sup>51</sup> Al Sharpton, BIO, <http://www.biography.com/people/al-sharpton-207640>

<sup>52</sup> National Action Network, <http://nationalactionnetwork.net/about/>

“That’s why we’re going to do this march from here to Washington. We need the Justice Department to step in and take over policing in this country.”<sup>53</sup>

102. Since the deaths of Michael Brown and Eric Garner, Defendant Sharpton and his agents have travelled across the mid-west and northeast to hold rallies and protest marches inciting the blacks and others to undertake attacks causing death or serious bodily injury against police officers and law enforcement of all races and ethnicities, Jews and Caucasians.<sup>54</sup>

103. Defendant Sharpton lead incendiary and inflammatory rallies in Ferguson, Missouri, early on in the developing violence and incited the looting, arson, destruction of property, assaults on police, threatening mobs, and violence.

104. In one of Defendant Sharpton’s rallies that occurred on December 15, 2014 in New York City, marchers were chanting death threats to the police: **“What do we want? Dead cops! When do we want it! Now!”**<sup>55</sup> The protesters event assaulted two NYPD officers and blocked traffic on the Brooklyn Bridge.<sup>56</sup>

105. On December 20, 2014, only five days after the hateful protest involving death threats to the police, Brinsley executed two New York City police officers as they ate lunch together in their police car, took place. As stated previously, Brinsley expressed that the police shootings of Michael Brown and Eric Garner were the reason he planned to murder the two police officers.<sup>57</sup>

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<sup>53</sup> Brian Hayes, "Al Sharpton Wants to 'End' Local Policing, Demands NATIONALIZED Police Force," Top Right News, May 1, 2015, accessible at: <http://toprightnews.com/al-sharpton-wants-to-end-local-policing-demands-nationalized-police-force>

<sup>54</sup> Video posted at: Geoffrey Grider, "Al Sharpton Incited Anti-Police Violence Now Seeks Police Protection, December 22, 2014, accessible at: <http://www.nowtheendbegins.com/blog/?p=29363>

<sup>55</sup> "Obama, Holder, Sharpton Stoke Flames, Ferguson Officers Shot," Breitbart, March 12, 2015, *supra*.

<sup>56</sup> Warner Todd Huston, "Al Sharpton Leads March in DC as NYC Protesters Chant: 'What Do We Want? Dead Cops!,'" Breitbart, December 13, 2014, accessible at: <http://www.breitbart.com/big-government/2014/12/13/al-sharpton-leads-thousands-in-saturday-march-on-washington-dc/>

<sup>57</sup> "Obama, Holder, Sharpton Stoke Flames, Ferguson Officers Shot," Breitbart, March 12, 2015, *supra*.

106. In a similar protest, a march organized by Defendant NAN again chanted the oft-heard slogan (and implied threat), “No Justice, No Peace” with marchers demanding that federal laws be enacted to curb local and state police agencies use of force rules.

107. Once the thousands of marchers reached the grounds outside the New York Capitol, Sharpton warned Congress that he and his supporters would not be ignored. “You thought you’d sweep it under the rug. You thought there’d be no limelight,” Sharpton said. “We are going to keep the light on Michael Brown, on Eric Garner, on Tamir Rice, on all of these victims because the only way—I’m sorry, I come out of the ‘hood—the only way you make roaches run, you got to cut the light on.”<sup>58</sup>

108. Defendant Sharpton’s incitement of violence and rioting have brought about further discord and hatred in America. Defendant Sharpton has been a prime contributor of civil unrest and violence in predominantly black urban communities.

109. Defendant Sharpton's actions and statements call for anarchy and encourage blacks to ignore, disrespect, and engage law enforcement officials, namely Caucasian officers, with violence and lethal force.<sup>59</sup>

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<sup>58</sup> “Al Sharpton Leads March in DC as NYC Protesters Chant: ‘What Do We Want? Dead Cops!’,” Breitbart, December 13, 2014, *supra*. Rep. Peter T. King (R-N.Y.) and former New York governor George Pataki have blamed Sharpton for using rhetoric that they said fostered an anti-police environment. Former New York City police commissioner Bernard Kerik said Sharpton and others had “blood on their hands.” Sandhya Somashekhar and Wesley Lowery, “Sharpton faces criticism after NYC officers’ deaths,” *The Washington Post*, December 23, 2014, accessible at: [http://www.washingtonpost.com/politics/sharpton-faces-criticism-after-nyc-officers-deaths/2014/12/23/4ddeafd4-8ab6-11e4-8ff4-fb93129c9c8b\\_story.html](http://www.washingtonpost.com/politics/sharpton-faces-criticism-after-nyc-officers-deaths/2014/12/23/4ddeafd4-8ab6-11e4-8ff4-fb93129c9c8b_story.html)

<sup>59</sup> <https://www.change.org/p/patrick-murphy-remove-al-sharpton-from-white-house-advisory-team-and-conduct-a-federal-investigation-to-charge-mr-sharpton-with-inciting-riots-promoting-violence-against-law-enforcement-and-encouraging-civil-unrest-in-urban-communities-across-america>. Former New York City mayor Giuliani said himself that Defendant Sharpton has been to the white House as many as 85 times, and he blamed the “civil rights leader” for instigating riots and inflaming tensions between police and the public. Giuliani also said Obama “hasn’t made strong comments” about the deaths of the New York police officers. He further stated that “If you would like to have a poster boy for hating the police, it’s Al Sharpton. You make Al Sharpton a close adviser, you’re going to turn the police in America

110. Defendant Sharpton's statements were intended to cause violence and/or death to U.S. police officers of all races and ethnicity, Jews, and Caucasians. Defendant Sharpton is a friend of and close confidant of President Obama and is thus a frequent visitor to the White House, where he has and continues to participate in meetings designed for further a race war for their joint political missions and agendas. Defendant Sharpton is also a close friend, confidant, and co-conspirator with Defendant Farrakhan and the other Defendants to the acts as pled herein.

**D. Defendants Black Lives Matter, Opal Tometi, Patrisse Cullors, Alicia Garza, Rashad Turner, Johnetta Elzie, and Deray Mckesson**

111. Defendant Black Lives Matter is a so called political project that was launched in the wake of the murder of Trayvon Martin in order to supposedly combat implicit bias and anti-black racism and to protect and affirm the beauty and dignity of all black lives.<sup>60</sup>

112. While Defendant Black Lives Matter claims to combat anti-black racism, the movement has in fact incited and committed further violence, severe bodily injury and death against police officers of all races and ethnicities, Jews, and Caucasians. Defendant Black Lives Matter is in fact a violent and revolutionary criminal gang.

113. Dominique Alexander, who helped organize the July 7, 2016 "protest" that led to the Dallas Police Shooting, was recently sentenced to five years in prison for probation violations.<sup>61</sup>

114. Defendant BLM was created in response to the false propaganda deceptively and fraudulently convincing blacks that they are being targeted by police officers and other law enforcement personnel and are being disproportionately arrested and prosecuted.

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against you." <http://www.ibtimes.com/obama-al-sharpton-relationship-shows-president-anti-cop-rudy-giuliani-1768276>.

<sup>60</sup> "BAJI's Staff," Black Alliance for Just Immigration, <http://www.blackalliance.org/about/bajistaff/>

<sup>61</sup> Naheed Rajwani, *Judge Extends Dallas Activist Dominique Alexander's Prison Sentence to 5 Years*, Dallas News, September 9, 2016, available at: <http://www.dallasnews.com/news/local-news/20160909-judge-extends-dallas-activist-dominique-alexander-s-prison-sentence-to-5-years.ece>

115. Defendant Black Lives Matter (“Defendant BLM”) was created by Defendants Alicia Garza (“Defendant Garza”), Patrisse Cullors (“Defendant Cullors”), and Opal Tometi (“Defendant Tometi”). Defendants Rashad Turner (“Defendant Turner”), Johnetta Elzie (“Defendant Elzie”) and DeRay McKesson (“Defendant McKesson”) are all leaders of Defendant BLM.

116. Defendant BLM’s calls for and incitement of violence of death have undeniably led to explosions of violence as a direct result.

117. In response to the incitement to violence of the Defendants, on September 2, 2015, Carlos Anthony Hollis, (“Hollis”) under the Twitter name of “black guy in avi,” broadcast a message on Twitter saying: “IM NOT GONNA STAND FOR THIS NO. MORE. TONIGHT WE PURGE! KILL ALL THE WHITE PPL IN THE TOWN OF LAPLATA #BlackLivesMatter.”

118. Hollis, the Maryland man who called for the killing of white people in his town of La Plata, announced that he would be killing white people in La Plata. In other words, in the legal meaning of incitement, Hollis announced that he was heading out to kill white people and urged others to come join him in this imminent violence.

119. Hollis was arrested the same day and charged with the issuance of deadly threats against local citizens.

120. On July 7, 2016, Lakeem Keon Scott (“Scott”) shot at passing cars along a Tennessee highway, killing one woman and wounding three others, including a police officer.<sup>62</sup> Witnesses heard Scott yelling “police suck! Black lives matter!” as he opened fire.<sup>63</sup> Police later

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<sup>62</sup> *Witness heard Bristol gunman yelling, ‘Police suck! Black lives matter!’ as he opened fire*, CNN Wire, July 8, 2016, available at: <http://wtvr.com/2016/07/08/bristol-gunman-lakeem-keon-scott-yelled-olice-suck-black-lives-matter/>

<sup>63</sup> *Id.*

on found “Black Lives Matter” materials inside of Scott’s home.<sup>64</sup> All of Scott’s victims were Caucasian.<sup>65</sup>

121. On July 29, 2016 17-year old Marquell Rentas (“Rentas”) attempted to shoot and kill four police officers in Columbia, Pennsylvania while his 18-year old cousin, Trenton Nace (“Nace”), aided him.<sup>66</sup> Rentas left no question as to his motivation, telling police “I was shooting at you, F-you, police.”<sup>67</sup> Rentas’ mother blames Black Lives Matter for indoctrinating her child and inciting violence, saying. “[Rentas and Nace] are in jail for doing what Black Lives Matter wanted them to do: shoot at cops. The truth is that these are two punk kids following the orders of an irresponsible organization and now they’re going to pay for it.”<sup>68</sup>

122. In September, 2015, Joseph Thomas Johnson-Shanks (“Shanks”) shot and killed Trooper Joseph Cameron Ponder after leading Kentucky State Police on a high speed chase.<sup>69</sup> Shanks’ Facebook account has conclusively shown that Shanks was an advocate of Black Lives Matter, showing Shanks’ presence at protests and at Michael Brown’s funeral.

123. The term “purge” has been adopted by the Black Lives Matter movement, referring to a recent movie “The Purge” depicting a society in which on one night a year all laws are suspended and unlimited violence, looting, murder, assault, rape, etc. is allowed.

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<sup>64</sup> *Id.*

<sup>65</sup> Mark Heim, *Tennessee Highway Gunman Kills 1, Injures 3, Motivated by Police Shootings*, *Authorities Said*, AL, July 8, 2016, available at:

[http://www.al.com/news/index.ssf/2016/07/tennessee\\_highway\\_gunman\\_motiv.html](http://www.al.com/news/index.ssf/2016/07/tennessee_highway_gunman_motiv.html)

<sup>66</sup> Joe Elias, *Boy, 17, Charged with Trying to Shoot and Kill Four Lancaster County Police Officers*, *Penn Live*, July 30, 2016, available at:

[http://www.pennlive.com/news/2016/07/boy\\_17\\_charged\\_with\\_trying\\_to.html](http://www.pennlive.com/news/2016/07/boy_17_charged_with_trying_to.html)

<sup>67</sup> *Id.*

<sup>68</sup> *PA Mom Blames Black Lives Matter for Son Shooting Police*, RT, August 3, 2016, available at:

<https://www.rt.com/usa/354424-mom-blames-black-lives-matter-shooting-police/>

<sup>69</sup> Nina Golgowski, *Suspect in Kentucky Trooper’s Shooting Death Was a ‘Black Lives Matter’ Advocate in St. Louis, Facebook Shows*, *NY Daily News*, September 14, 2015, available at:

<http://www.nydailynews.com/news/national/suspect-trooper-death-black-lives-matter-backer-article-1.2360320>

124. The term “Purge” within the Black Lives Matter movement specifically refers to lawless rioting, arson, murder, assault, looting, and rape carried out as perceived revenge against anyone who has more, especially Jews or Caucasians, as a routine part of the movement.

125. In Ferguson, Missouri, after violent assaults by a repeat juvenile delinquent Michael Brown upon an elderly shopkeeper and then upon police officer on August 9, 2014, the BLM Defendants incited, instigated, and orchestrated violence, arson, looting, assault, and rioting.

126. Residents of Ferguson, Missouri, reported that most of the violence, arson, looting, assaults on police, and threatening behavior was committed by outsiders who came to Ferguson from all over the United States, as far away as San Francisco and New York City. In fact, records show that many of Defendant BLM’s Ferguson “protesters” were actually paid to be there by Missourians Organizing for Reform and Empowerment, a branch of ACORN who has supported Defendant BLM.<sup>70</sup>

127. On August 29, 2015, just a few days after Shannon J. Miles executed Deputy Darren Goforth, a march was led under the Black Lives Matter movement in St. Paul, Minnesota.

128. During the march, protesters chanted in unison, **“Pigs in a blanket, fry em’ like bacon.”** The chant was clearly meant to promote and cause severe bodily injury or death among innocent police officers policers of all races and ethnicities, who were, ironically, at the march to help protect the protestors’ free speech.<sup>71</sup>

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<sup>70</sup> Jessica Chasmar, *Hired Black Lives Matter Protesters Start #CutTheCheck After Being Stiffed by ACORN Successor Group*, Washington Times, May 19, 2015, available at <http://www.washingtontimes.com/news/2015/may/19/hired-black-lives-matter-protesters-start-cutthech/>

<sup>71</sup> Bill Hudson, “Black Lives Matter Chant Called ‘Disgusting’ By Police Leader,” CBS Minnesota, August 30, 2015, accessible at: <http://minnesota.cbslocal.com/2015/08/30/black-lives-matter-chant-called-disgusting-by-police-leader/> ; <https://www.youtube.com/watch?v=9xNxoeqf0Ws>



129. Milwaukee County Sheriff David Clarke has openly expressed that Black Lives Matter is a race baiting movement intended to create more division and segregation.<sup>72</sup>

130. In an appearance on CNN, Sheriff Clarke pointed out that Black Lives Matter activists are directly tied to the brutal murder of Harris County, Texas deputy Darren Goforth.<sup>73</sup>

131. Sheriff Clarke has described the Black Lives Matter movement as “vile, vulgar, and slimy.”

132. In response, Sergeant Demetrick Pennie, Sheriff David Clarke and other African-American members of law enforcement who have had the courage to speak out against the hateful message of the BLM Defendants have been unfairly labeled by the BLM Defendants as “sellout” and an “Uncle Tom.”<sup>74</sup>

133. For example, members of the #FYF911 or #FukYoFlag and #blackLivesMatter movements called for the lynching and hanging of white people and cops.

134. The BLM Defendants have encouraged others on a radio show night to “turn the tide” and kill white people and cops to send a message about the killing of black people in America.<sup>75</sup>

135. Despite the fact that the BLM Defendants hold themselves out as fighting injustice on behalf of all African Americans, many African Americans have seen through the BLM Defendants’ façade and have instead joined the All Lives Matter movement.<sup>76</sup>

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<sup>72</sup> “Sheriff Clarke: Black Lives Matter Is A ‘Vulgar, Vile, Vicious, Slimy Movement,’” Infowars.com, September 1, 2015, *supra*.

<sup>73</sup> *Id.*

<sup>74</sup> Chuck Ross, Black Sheriff Responds To ‘Uncle Tom’ Taunt By New York Daily News Columnist And Black Lives Matter Activist, Daily Caller, October 27, 2015, available at: <http://dailycaller.com/2015/10/27/black-sheriff-responds-to-uncle-tom-taunt-by-new-york-daily-news-columnist-and-black-lives-matter-activist/#ixzz4JnWtmS5j>

<sup>75</sup> Lana Shadwick, “Black Activists Call for Lynching and Hanging of White People and Cops,” Breitbart, August 28, 2015, accessible at: <http://www.breitbart.com/texas/2015/08/28/black-activists-called-for-lynching-and-hanging-of-white-people-and-cops/>

136. A 27-year-old black Marine Michael Whaley explains in a video spreading nation-wide and rebroadcast on Fox news:<sup>77</sup>

This Black Lives Matter movement only promotes racism and now they are encouraging black people to go and kill white people because they want white people to feel what we felt 400 years ago. All Lives Matter. That police officer that got killed by that black man because that black man listened to what y'all were saying about going out and killing white people. That police officer's life mattered. That nine-year old girl in Ferguson, Missouri, that got shot in the head while she was doing her homework, in a drive-by shooting, that none of y'all protested. Her life mattered. ... The reason that I don't got a lot of support is, I'm gonna tell you the God honest truth, the reason that I don't got a lot of support is because black people can't accept the truth about their-selves. Black people admitting to the truth is like they're snitching on their-selves. And black people have this no-snitching rule. They're gonna deny till they die.

Y'all teaching black people to hate white people, and then you're encouraging black people to throw their lives down the drain by taking away somebody else's life. Sad. I'm gonna pray for y'all.

137. Michael Whaley explained further on Fox News on September 2, 2015, that

Black on black crime happens every day. So if a black person goes and kills another black person, they gonna deny till they die. They're not gonna admit the truth. Some people don't like admitting the truth because they don't like that. Like, it hurts me to say right there, it hurts me as a black man to say right here I have to tell the truth about my own people, but I love my own people.

138. On August 29, 2015, the mixed-race Guiding Light Church led a "Restoring Unity Rally" and march in Birmingham, Alabama. On September 1, 2015, the mostly-black choir of

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<sup>76</sup> [www.alllivematter.com](http://www.alllivematter.com)

<sup>77</sup> <http://video.foxnews.com/v/4460311780001/black-americans-fight-back-against-black-lives-matter-/?#sp=show-clips>

the church performed a hymn 'All Lives Matter' calling for unity and forgiveness by God's grace.<sup>78</sup>

**E. Defendants New Black Panther Party and Malik Zulu Shabazz**

139. Defendant New Black Panther Party (“NBPP”) became active in or around the year 1990.<sup>79</sup> In 1994, Khalid Abdul Muhammad (“Muhammad”) became actively involved with Defendant NBPP.<sup>80</sup> Muhammad had previously been the personal assistant to Defendant Farrakhan, but contentiously left after he was demoted from his position as national spokesman for Defendant NOI after giving a speech where he called Jews “bloodsuckers” and called for the murder of white South Africans who refused to leave South Africa.<sup>81</sup>

140. From the time that Muhammad joined Defendant NBPP, there existed a contentious relationship between Defendants NOI and NBPP, whereby each hate group fought the other for recruits, akin to Al-Qaeda and ISIS. In fact, Muhammad was shot and injured in May, 1994 by a former Nation of Islam member.<sup>82</sup>

141. Defendant NBPP has deep and clearly-established anti-Semitic, anti-Caucasian views, and Defendant NBPP routinely calls for the murder of individuals fitting those descriptions.

142. As described in the preceding paragraphs of this Complaint, Johnson, who perpetrated the Dallas Police Shooting, was a member of Defendant NBPP, as confirmed through

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<sup>78</sup> <http://video.foxnews.com/v/4456810813001/the-guiding-light-church-performs-all-lives-matter/?#sp=show-clips>

<sup>79</sup> Southern Poverty Law Center, *Extremist Files: New Black Panther Party*

<sup>80</sup> *Id.*

<sup>81</sup> *Id.*

<sup>82</sup> *Id.*

his social media posts.<sup>83</sup> Johnson carried out the Dallas Police Shooting under the direction of Defendant NBPP and in furtherance of the hateful and violent dogmatic beliefs of Defendant NBPP.

143. Defendant NBPP has threatened Plaintiff Klayman's life and the life of his family after Plaintiff Klayman filed the original complaint, as discussed previously in the Complaint. Plaintiff received a call from Defendant New Black Panther Party, saying, "you cracker...you broke with the Black Panthers and the black lives matter and all black people in this country. God probably alone. You should be worried about the [safety of] you[r] whole goddamn family."

144. For instance, former NBPP chairman Muhammad has been quoted as saying

Our lessons talk about the bloodsuckers of the poor... . It's that old no-good Jew, that old imposter Jew, that old hooked-nose, bagel-eating, lox-eating, Johnny-come-lately, perpetrating-a-fraud, just-crawled-out-of-the-caves-and-hills-of-Europe, so-called damn Jew ... and I feel everything I'm saying up here is kosher.<sup>84</sup>

145. Defendant NBPP has taken a stance so radical and violent that even the original Black Panther Party has decried Defendant NBPP for being a hateful and unconstructive group. Bobby Seale, one of the founders of the original Panthers, calls Defendant NBPP, "a black racist hate group."<sup>85</sup>

146. In 2001, Defendant Malik Zulu Shabazz ("Defendant Shabazz") took over as chairman of Defendant NBPP after Muhammad passed away.<sup>86</sup> However, Defendant Shabazz shares the same hateful and violent beliefs as his predecessor and mentor, Muhammad. On April

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<sup>83</sup> Bob Price, *Confirmed: Dallas Shooter Was Member of Houston New Black Panther Party*, BrietBart, July 8, 2016, available at: <http://www.breitbart.com/texas/2016/07/08/confirmed-dallas-shooter-member-houston-new-black-panther-party/>

<sup>84</sup> Southern Poverty Law Center, *supra* note 77.

<sup>85</sup> *Id.*

<sup>86</sup> *Id.*

20, 2002, Defendant Shabazz said, “Kill every goddamn Zionist in Israel! Goddamn little babies, goddamn old ladies! Blow up Zionist supermarkets!”<sup>87</sup>

147. In March, 2012, a Florida leader of Defendant NBPP placed a \$10,000 bounty on George Zimmerman, who had killed Trayvon Martin. His rationalization was, “An eye for an eye, a tooth for a tooth.”<sup>88</sup>

148. In January, 2009, the Philadelphia leader of Defendant NBPP, King Samir Shabazz said:

I hate white people. All of them. Every last iota of a cracker, I hate it. We didn't come out here to play today. There's too much serious business going on in the black community to be out here sliding through South Street with white, dirty, cracker whore bitches on our arms, and we call ourselves black men. ... What the hell is wrong with you black man? You at a doomsday with a white girl on your damn arm. We keep begging white people for freedom! No wonder we not free! Your enemy cannot make you free, fool! You want freedom? You going to have to kill some crackers! You going to have to kill some of their babies!

149. Unlike his predecessor, Defendant Shabazz has been working to rekindle Defendant NBPP’s relationship with Defendant Farrakhan and Defendant NOI. As of January, 2010, Defendant Shabazz was expressing approval of Defendant NOI and reiterating his commitment to support its efforts.<sup>89</sup> This is evidence that Johnson carried out the Dallas Police Shooting at the direction of both Defendant NOI and Defendant NBPP.

**F. Defendant George Soros**

150. Defendant George Soros (“Defendant Soros”) is a billionaire financier who has funded numerous radical, left wing groups, including “ACORN, Apollo Alliance, National Council of La Raza, Tides Foundation, Huffington Post, Southern Poverty Law Center,

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<sup>87</sup> *Id.*

<sup>88</sup> *Id.*

<sup>89</sup> *Id.*

Soujourners, People for the American Way, Planned Parenthood, and the National Organization for Women.” Defendant Soros is also a financial backer of “Media Matters for America”, a leftist, radical publication.<sup>90</sup>

151. Importantly, Defendant Soros is widely known as one of the primary financial backers of the Black Lives Matter movement. Defendant Soros has contributed at least \$650,000 directly in furtherance of the Black Lives Matter movement’s calls to violence and death.<sup>91</sup>

152. Defendant McKesson, a leader of Defendant BLM, even lives in the home of Robin Wood, who is a board members of Defendant Soros’ Open Society Institute.<sup>92</sup>

153. Defendant Soros has given at least \$33 million in one year to support various groups, such as Black Lives Matters, who are serving to further the on-going racial war by inciting racial violence.<sup>93</sup>

154. Defendants Soros has gone so far as to pay over 80 individuals and organizations to “protest” during the civil unrest that occurred in Ferguson, Missouri, in furtherance of the violent and hateful incitements to violence perpetrated by his co-Defendants.<sup>94</sup>

155. Defendant Soros, who himself is of Jewish origin, is admittedly anti-Semitic.<sup>95</sup> Defendant Soros and his father, Theodore, were both Nazi sympathizers and collaborators. In

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<sup>90</sup> Human Events, Top 10 Reasons George Soros is Dangerous, <http://humanevents.com/2011/04/02/top-10-reasons-george-soros-is-dangerous/>

<sup>91</sup> BrietBart, Hacked Soros Memo: \$650,000 to Black Lives Matter, <http://www.breitbart.com/big-government/2016/08/16/hacked-soros-memo-baltimore-riots-provide-unique-opportunity-reform-police/>

<sup>92</sup> Cozy: BLM Leader Lives in Home Owned by Soros’ Open Society Board Member, <http://www.theamericanmirror.com/blacklivesmatter-leader-deray-lives-home-owned-by-soros-connected/>

<sup>93</sup> Washington Times, George Soros Funds Ferguson Protests, Hopes to Spur Civil Action, <http://www.washingtontimes.com/news/2015/jan/14/george-soros-funds-ferguson-protests-hopes-to-spur/>

<sup>94</sup> Paul Joseph Watson, Leaked List Shows Ferguson Protesters Paid By Soros Front Group, InfoWars, May 19, 2016, available at: <http://www.infowars.com/leaked-list-shows-ferguson-protesters-paid-by-soros-front-group/>

<sup>95</sup> George Soros, <http://www.jewishvirtuallibrary.org/jsource/biography/Soros.html>

fact, “Soros betrayed other Jews and helped steal their property and send them to their tragic deaths to spare himself.”<sup>96</sup>

156. Defendant Soros is the driving force and primary financial backer of the Black Lives Matter movement, and other related groups. Without Defendant Soros’ financial backing, Black Lives Matter and other related groups would be unable to carry out their war against those of Caucasian and Jewish descent and law enforcement officers.

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<sup>96</sup> George Soros Says He Feels No Remorse For Collaborating With Nazis During WWII to Send His Fellow Jews to the Death Camps, Steal Their Property, <http://itmakessenseblog.com/2011/01/28/george-soros-says-he-feels-no-remorse-for-collaborating-with-nazis-during-wwii-to-send-his-fellow-jews-to-the-death-camps-steal-their-property/>

**V. CAUSES OF ACTION**

**FIRST CAUSE OF ACTION**

***Wrongful Death***

157. Plaintiff repeat and re-allege each and every allegation of the foregoing paragraphs as if fully set forth herein.

158. Defendants' acts, each and every one of them, of inciting and/or carrying out actions of violence against police officers and law enforcement persons of all races and ethnicities, Jews, and Caucasians were done with the intent to terrorize, threaten, intimidate, and frighten the Plaintiffs and class members, as well as to actually commit acts of violence against them.

159. The death of Patrick Zamarripa was a direct and proximate result of Defendants' acts of inciting and/or carrying out actions of violence against police officers and law enforcement persons of all races and ethnicities, Jews, and Caucasians.

160. As set forth in the Complaint, Johnson, who murdered Patrick Zamarripa told authorities that 'he was upset about the recent police shootings' and 'wanted to kill white people, especially white officers.'<sup>97</sup> Johnson carried out this murder under the direction of Defendants Farrakhan and NOI and NBPP, of which Johnson was a member, as well as Defendants Sharpton and NAN. Defendants NOI and NBPP coordinated and directed the Dallas Police Shooting in furtherance of the conspiracy with each and every Defendant to wage a war against law enforcement officers, Caucasians, and Jews.

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<sup>97</sup> Tim Madigan, Michael E. Miller, Travis M. Andrews and Mark Berman, "Snipers kill five police officers in Dallas, wound seven others during protest," The Washington Post, July 8, 2016, accessible at: [https://www.washingtonpost.com/news/morning-mix/wp/2016/07/08/like-a-little-war-snipers-shoot-11-police-officers-during-dallas-protest-march-killing-five/?hpid=hp\\_rhp-top-table-main\\_mm-dallas-1120pm-6a%3Ahomepage%2Fstory](https://www.washingtonpost.com/news/morning-mix/wp/2016/07/08/like-a-little-war-snipers-shoot-11-police-officers-during-dallas-protest-march-killing-five/?hpid=hp_rhp-top-table-main_mm-dallas-1120pm-6a%3Ahomepage%2Fstory)



161. As a result of the death of Patrick Zamarripa, Plaintiff Zamarripa has suffered pecuniary loss equaling the financial support the deceased would have been expected to provide, in addition to loss of services, mental anguish, and pain and suffering.

162. Plaintiff is the father of Patrick Zamarripa, and is thereby entitled to bring this action.

**SECOND CAUSE OF ACTION**  
***Intentional Infliction of Emotional Distress***

163. Plaintiff repeats and re-alleges each and every allegation of the foregoing paragraphs as if fully set forth herein.

164. Defendants', each and every one of them acting in concert, acts of inciting and/or carrying out actions of violence against police officers and law enforcement persons of all races and ethnicities, Jews, and Caucasians were done with the intent to terrorize, threaten, intimidate, and frighten Plaintiff, as well as to actually commit acts of violence against them.

165. Defendants' acts of promoting and/or carrying out actions of violence against police officers and other law enforcement persons of all races and ethnicities, Jews, and Caucasians were willful malicious, deliberate, or were done with reckless indifference to the likelihood that such behavior would cause severe emotional distress and with utter disregard for the consequences of such actions.

166. The acts of violence and murder set forth herein were committed with the knowledge of and intention to cause extreme physical pain and suffering to any and all persons within close proximity of the attack and extreme emotional distress to the Plaintiff and other members of the class herein and/or family members of those who were killed or injured by reason of those acts, or were done with reckless indifference to the likelihood that such behavior

would cause such severe emotional distress and with utter disregard for the consequences of such actions.

167. Defendants' conduct, each and every one of them, jointly and severally, was unreasonable and outrageous and exceeds the bounds usually tolerated by decent society, and was done willfully, maliciously and deliberately, or with reckless indifference, to cause Plaintiff severe mental and emotional pain, distress, and anguish and loss of enjoyment of life.

168. By reason of the wrongful conduct of Defendants, Plaintiff has suffered conscious pain, suffering, severe emotional distress and the fear of imminent serious bodily injury or death, and have suffered pecuniary and economic damage, loss of support, loss of nurture, care and guidance, grief, anguish, loss of services, loss of society, and other mental and physical injuries.

169. Defendants, each and every one of them, conspiring and/or acting in concert, jointly and severally, undertook their actions willfully, wantonly, maliciously and in reckless disregard for Plaintiff's rights, and as a direct, foreseeable, and proximate result thereof plaintiffs suffered economic and emotional damage in a total amount to be proven at trial, therefore plaintiffs seeks punitive damages in an amount sufficient to deter Defendants and others from similar future wrongful conduct.

#### **PRAYER FOR RELIEF**

Plaintiffs demands that judgment be entered against Defendants, each and every one of them, jointly and severally, for compensatory and actual damages because of their demonstrable physical and emotional injury to Plaintiff, punitive damages because of Defendants' callous and reckless indifference and malicious acts, and attorney's fees, costs, an award of actual and compensatory damages in excess of \$90,000,000, punitive damages in excess of \$550,000,000, and such other relief the Court may deem just and proper.

**JURY DEMAND**

Plaintiff respectfully demands a jury trial on all issues so triable.

Dated: November 7, 2016

Respectfully submitted,  
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